

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
In re:

Chapter 11

Linda Endres Greco,

Case No. 24-44301-ESS

Debtor.  
-----X

**DEBTOR’S LIMITED OBJECTION TO MOTION  
FOR A RULE 2004 EXAMINATION**

The debtor herein, Linda Endres Greco (the “Debtor”) hereby submits limited objection to the Motion of NH Smith Lender LLC (“NH Smith”) for a Rule 2004 examination; and respectfully represents and shows this Court as follows:

1. The Debtor filed a voluntary Chapter 11 petition on October 17, 2024 (the “Petition Date”) and has continued in possession and management of her assets as a debtor-in-possession pursuant to 11 U.S.C. §§1107 and 1108.

2. NH Smith holds a monetary judgment against the Debtor’s husband, Louis Greco, and has no claims against the Debtor or her companies. Accordingly, NH Smith lacks standing to seek Rule 2004 discovery in this bankruptcy case. Moreover, according to the application filed in support of the motion, documents and testimony are sought in aid of judgment enforcement against a non-debtor and the Bankruptcy Court is not a proper forum for relief.

3. NH Smith tries to sidestep these issues by naming the Debtor individually as owner of Second Development Services Inc. (“SDS”) and as the trustee of certain family trusts. However, SDS is not itself a debtor in this Court, and Ms. Greco’s positions as owner of SDS and as a trustee of certain family trusts likewise are not part of this Chapter 11 case.

4. The relief sought should be directed to SDS and the Trusts in the proper forum, and not against the Debtor individually.

5. The undersigned counsel for the Debtor also wishes to apologize to the Court and counsel for NH Smith for the lateness of this filing. I was out of the country and only returned this morning.

**WHEREFORE**, the Debtor respectfully requests entry of an Order denying the request for a Rule 2004 examination, together with such other and further relief as is just and proper.

Dated: New York, New York  
February 19, 2025

Goldberg Weprin Finkel Goldstein LLP  
*Attorneys for the Debtor*  
125 Park Avenue, 12<sup>th</sup> Floor  
New York, NY 10017  
(212) 221-5700

By: /s/ J. Ted Donovan, Esq.